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Self Represented

STOUT LAW FIRM, LLP. and JAMES RUSSELL STOUT, PLAINTIFFS

**UNITED STATES DISTRICT COURT**

**SOUTHERN DIVISION OF CALIFORNIA**

STOUT LAW FIRM, LLP., a California  
Limited Liability Partnership; and JAMES  
RUSSELL STOUT, an individual,

Plaintiffs,

v.

LAURENSAYS 5, an individual; NIKKO B.,  
an individual; ROBERT M., an individual;  
RUBY M., an individual; MELINDA K., an  
unknown entity; ALYSSA M., an unknown  
entity; CHARLOTTE T., an unknown entity;  
KATHRYN M., an unknown entity;  
CASSANDRA W.; and DOES 1-50, inclusive,

Defendants.

**Case No.: 8:25-cv-126**

**COMPLAINT FOR:**

- 1. VIOLATION OF TRADE  
REGULATION RULE ON THE USE OF  
CONSUMER REVIEWS AND  
TESTIMONIALS (16 CFR PART 465);**
- 2. LIBEL PER SE;**
- 3. CIVIL CONSPIRACY; and**
- 4. INJUNCTIVE RELIEF.**

**COME NOW** Plaintiffs STOUT LAW FIRM, LLP. and JAMES RUSSELL STOUT,  
ESQ. (collectively referred to hereinafter as “Plaintiff”) self represented, hereby complains,  
avers, and alleges against Defendants LAURENSAYS 5, NIKKO B., ROBERT M., RUBY M.,  
MELINDA K., ALYSSA M., CHARLOTTE T., KATHRYN M., and CASSANDRA W.  
(collectively referred to hereinafter as “Defendants”) as follows:

I.

**FACTUAL BACKGROUND**

1. Code of Federal Regulations *16 CFR 465* makes **review bombing an illegal act** (effective 10/21/24). It bans “Fake or False Consumer Reviews” (§465.2). False reviews are defined, as statements made by someone who did not have actual experience with the service. (§465.2(a)). The Federal Trade Commission (“FTC”) is authorized to impose fines of \$51,744.00 per incident.
2. Here, Defendants, **who were never clients of Plaintiff**, posted negative reviews and threats of violence on Plaintiff’s online Yelp business review web site to humiliate, intimidate, and tarnish Plaintiff’s reputation as a trial attorney.
3. Defendant LAURENSAYS 5 (referred to hereinafter as “Lauren”) is a TikTok creator who posts videos on TikTok where she initiates violence. (Plaintiff will amend this Complaint to name the true identity of Lauren and other Defendants, once their true identity is ascertained).
4. Based on information and belief, Lauren is a leader of an international criminal organization that review bombs businesses and threatens violence against victims. Violent threats are felonies under federal law.
5. Lauren initiated, coordinated, and supervised an attack on Plaintiff’s Yelp business review website (referred to hereinafter as “Plaintiff’s Yelp website”). Attached hereto as **“Exhibit 1”** is a screen shot of one of Lauren’s videos posted on Plaintiff’s Yelp website. That video is evidence that Lauren intentionally directed the other Defendants to post negative reviews on Plaintiff’s Yelp website.

1 6. Based on information and belief, Lauren also instructed the Defendants to post violent  
2 threats against Plaintiff. Attached hereto as **Exhibit “2”** is a copy of the violent threat by  
3 defendant Nikko B. which states, **“Hey man if you're gonna leave comments and**  
4 **harass women online, at least have a private account where people can't find where**  
5 **you work, live, and where your kids go to school. I live in Irvine too, don't make me**  
6 **visit.”**  
7

8 7. Lauren is criminally responsible for that threat, which is a felony under federal law.

9 8. Review bombing, threats of violence, and actual violence resulting from TikTok videos,  
10 is a trend. To prevent this trend, the individuals, leaders and organizations that carry out  
11 those acts must be prosecuted, their organizations disrupted, and infrastructure built to  
12 prevent future illegal actions.

13 9. Plaintiff was similarly review bombed on his business Google review website and filed a  
14 related case 8:24-cv-2801.  
15

16 10. TikTok must take action to prevent those crimes.

17 11. Plaintiff is working with TikTok, Google, Yelp and federal law enforcement to identify  
18 the Defendants true identities, and prosecute them to the fullest extent of the law.

19 12. Over the past decade, Plaintiff earned a small social media presence which includes  
20 approximately 50,000 followers platform-wide. That includes TikTok: 21,900; LinkedIn:  
21 20,029; Facebook: 13,000 and small followings on Instagram and Youtube. Plaintiff  
22 creates and posts primarily 60 second video skits of satirical “real life” interactions  
23 between a trial attorney, the judge and witnesses. Those videos are designed to educate  
24 and entertain lawyers and the public. Plaintiff posted more than three-hundred (300)  
25 videos so far since he began posting videos during the middle of the Pandemic.  
26  
27

13. Also, under the username “Stout Law Firm” aka “devil’s advocate” aka “troll\_for\_the\_devil”, Plaintiff regularly commented on TikTok videos made by other creators. Plaintiff commented on Lauren’s videos including a comment stating “I am the devil.” (See Exhibit “A”).

14. Rather than argue the points, the Defendants, with Lauren as their leader, conspired together to post negative revenge reviews and violent threats on Plaintiff’s Yelp website, for the purpose to cause harm to Plaintiff’s reputation and brand, and intimidate Plaintiff. The posts did in fact cause harm to Plaintiff.

15. **Plaintiff did no harm to Defendants.** There is no defense- they did it for their own self-gratification.

16. Plaintiff requests the Court order: 1) Defendants immediately remove ALL the reviews from the website; 2) Defendants are permanently enjoined from posting on Plaintiff’s social media; 3) Plaintiff is awarded joint and several damages against Defendants. The damages should include, but not be limited to, federal statutory damages of \$54,000, and additional exemplary or punitive damages to send a message to the public that review bombing and online threats are illegal and is punishable under federal law; and 4) Defendants are prosecuted under criminal law.

## **II.**

### **JURISDICTION AND VENUE**

17. This matter belongs in federal court under diversity jurisdiction because, based on information and belief, the Parties reside in different states.

18. Also, a federal question is presented in the Complaint, making federal court the proper jurisdiction.

1 19. Venue is proper because, based on information and belief, at least one defendant  
2 CHARLOTTE T. resides in Clark County, Nevada, and as such, this matter should be  
3 assigned to the Southern Division of this Court.

4 **III.**

5 **PARTIES**

6  
7 20. At all times relevant herein, Plaintiff, JAMES RUSSELL STOUT was an active licensed  
8 California attorney, who owns and operates STOUT LAW FIRM, LLP., a valid  
9 California corporation in good standing with its principal place of business in Irvine,  
10 California.

11 21. Plaintiff is informed and believes and thereupon alleges that, at all times relevant herein,  
12 Defendant Lauren, an individual, is a resident of an unknown state.

13 22. Plaintiff is informed and believes and thereupon alleges that, at all times relevant herein,  
14 Defendant NIKKO B. (“Nikko”), an individual, is a resident of an unknown state.

15 23. Plaintiff is informed and believes and thereupon alleges that, at all times relevant herein,  
16 Defendant RUBY M. (“Ruby”), an individual, is a resident of an unknown state.

17 24. Plaintiff is informed and believes and thereupon alleges that, at all times relevant herein,  
18 Defendant MELINDA K. (“Melinda”), an individual, is a resident of an unknown state.

19 25. Plaintiff is informed and believes and thereupon alleges that, at all times relevant herein,  
20 Defendant ALYSSA M. (“Alyssa”), an unknown entity, is a resident of an unknown of a  
21 state.  
22

23 26. Plaintiff is informed and believes and thereupon alleges that, at all times relevant herein,  
24 Defendant CHARLOTTE T. (“Charlotte”), an unknown entity, is a resident of Nevada.  
25  
26  
27

1 27. Plaintiff is informed and believes and thereupon alleges that, at all times relevant herein,  
2 Defendant KATHRYN M. (“Kathryn”), an unknown entity, is a resident of an unknown  
3 state.

4 28. Plaintiff is informed and believes and thereupon alleges that, at all times relevant herein,  
5 Defendant CASSANDRA W. (“Cassandra”), an unknown entity, is a resident of an  
6 unknown state.

7  
8 29. The true names and capacities, whether individual, corporate, associate or otherwise of  
9 the Defendants named herein as Does 1-50 are unknown to Plaintiff at this time, who  
10 therefore sues said Defendants by fictitious names and will ask leave of Court to amend  
11 this Complaint to show the true names and capacities said Defendants when the same is  
12 ascertained. Said Defendants are sued as principals and/or agents and all the acts  
13 performed by them were within the course and scope of their authority. Plaintiff is  
14 informed and thereupon believes that each of the Defendants are legally responsible in  
15 some manner and caused damages to Plaintiff as alleged herein.  
16

17 IV.

18 GENERAL FACTUAL ALLEGATIONS

19 30. On or about late 2024 Lauren posted a video instructing Defendants to post negative  
20 reviews and threats of violence on Plaintiff’s Yelp website (attached hereto as **Exhibit**  
21 **“1”** is a true and correct screen shot of Lauren’s video). Lauren had no contact with  
22 Plaintiff other than possibly through TikTok comments. There was never an attorney-  
23 client relationship.  
24

25 31. On or about late 2024 or early 2025 Nikko, Robert and Ruby posted a negative review  
26 and threat of violence on Plaintiff’s Yelp website (attached hereto as **Exhibit “2”** is a  
27

1 true and correct screen shot of those reviews). Nikko, Robert and Ruby had no contact  
2 with Plaintiff other than possibly through TikTok comments. There was never an  
3 attorney-client relationship.

4 32. On or about late 2024 or early 2025 Melinda, Alyssa, Charlotte, Kathryn, and Cassandra  
5 posted a negative review on Plaintiff's Yelp website (attached hereto as **Exhibit "3"** is a  
6 true and correct screen shot of those reviews). Melinda, Alyssa, Charlotte, Kathryn, and  
7 Cassandra had no contact with Plaintiff other than possibly through TikTok comments.  
8 There was never an attorney-client relationship.  
9

10  
11 33. The aforementioned false reviews reduced Plaintiff's online reputation.

12 34. The reviews resulted in criticism, dishonor, and condemnation of Plaintiff.

13 35. Plaintiff was financially harmed by at least a nominal, one dollar U.S. (\$1.00) as a result  
14 of those false reviews.  
15

16 36. The false reviews included false statements regarding Plaintiff.

17 37. The false reviews were made with actual malice, oppression and fraud.

18 38. The threats of violence caused Plaintiff emotional distress.

19 **V.**

20 **FIRST CAUSE OF ACTION**

21 **VIOLATION OF TRADE REGULATION RULE ON THE USE OF CONSUMER**

22 **REVIEWS AND TESTIMONIALS (16 CFR PART 465)-**

23 **(As to all Defendants)**

24  
25 39. Plaintiff incorporates his allegations in the above paragraphs as if the same are fully set  
26 forth herein.  
27

1 40. Plaintiff is requesting the Court permit Plaintiff to proceed with this action in conjunction  
2 with the FTC or as private right of action under *16 CFR Part 465*.

3 41. The Defendants posted the fake reviews notwithstanding the Defendants did not use or  
4 otherwise have experience with Plaintiff's legal practice, which was the subject of the  
5 fake reviews. Plaintiff did not provide the Defendants with any legal service.

6 42. Under §465.2(a) an individual who writes or creates a review is liable for creating  
7 consumer reviews that are fake or false. Defendants wrote and created a  
8 consumer review on Plaintiff's Google business review website.

9 43. As a result of Defendants' actions, Plaintiff was damaged in excess of Seventy-Five  
10 Thousand Dollars (\$75,000) as will be determined by proof introduced into evidence at  
11 trial. Plaintiff has incurred costs and is entitled to an award of attorney's fees and costs.  
12

13 **VI.**

14 **SECOND CAUSE OF ACTION**

15 **LIBEL PER SE**

16 **(As to all Defendants)**

17 44. Plaintiff incorporates his allegations in the above paragraphs as if the same are fully set  
18 forth herein.

19 45. Defendants made false and defamatory statements, and/or Defendants posted a one (1)  
20 star review. Some Defendants posted a screen shot from an unknown video. The  
21 Defendants had no experience with Plaintiff's business and thus, all the reviews are false  
22 and fake (See Exhibits 1-3 attached hereto).

23 46. The false reviews were published to the world.

24 47. People saw the false reviews and advised Plaintiff of the fake reviews.  
25  
26  
27



1 48. The false reviews would be highly offensive to a reasonable person.

2 49. The false reviews, whether a one star, text, or image, contained false facts that Plaintiff  
3 provided poor legal services, or was a bad attorney.

4 50. The false reviews contained defamatory and false facts.

5 51. Defendants intentionally made those false statements, and knew they were false at the  
6 time Defendants made them.

7 52. The fake reviews damaged Plaintiff's trade, business and profession. Damage is ongoing  
8 as some of the reviews have not been removed.

9 53. As a result of Defendants' actions, Plaintiff was damaged in excess of Seventy-Five  
10 Thousand Dollars (\$75,000) as will be determined by proof introduced into evidence at  
11 trial. Plaintiff incurred costs and is entitled to an award of attorney's fees and costs.  
12

13 **VII.**

14 **THIRD CAUSE OF ACTION**

15 **CIVIL CONSPIRACY**

16 **(As to all Defendants)**

17 54. Plaintiff incorporates his allegations in the above paragraphs as if the same are fully set  
18 forth herein.

19 55. Plaintiff is informed and believes that Defendants acted in concert to review bomb  
20 Plaintiff.  
21

22 56. Plaintiff is informed and believes that Defendants communicated, impliedly or expressly,  
23 and coordinated, with each other to post revenge reviews against Plaintiff.  
24

25 57. Plaintiff is informed and believes that each Defendant was aware that at least another  
26 Defendant planned to post bad reviews about Plaintiff on his Google business review  
27

website; and that each Defendant agreed with at least one other Defendant and intended to post bad reviews.

58. Each Defendant should be held liable for the acts of each other Defendant.

59. As a result of Defendants' actions, Plaintiff was damaged in excess of Seventy-Five Thousand Dollars (\$75,000) as will be determined by proof introduced into evidence at trial. Plaintiff has incurred costs and is entitled to an award of attorney's fees and costs.

### **VIII.**

### **FOURTH CAUSE OF ACTION**

### **INJUNCTIVE RELIEF**

### **(As to all Defendants)**

60. Plaintiff incorporates his allegations in the above paragraphs as if the same are fully set forth herein.

61. As of the date of the filing of this Complaint, some of the false reviews remain fully posted, and as such, the harm to Plaintiff is continuous.

62. The Court should order and enjoin Defendants and each of them to remove ALL the false reviews. The injunction should include each Defendant to be responsible for removing ALL false reviews.

63. Plaintiff is informed and believes, that some of the false reviews were created by another Defendant and are fake Google reviewer accounts.

64. The Court should order and enjoin Defendants from further posting on Plaintiff's social media, either directly, indirectly or by proxy.

65. As a result of Defendants' actions, Plaintiff was damaged in excess of Seventy-Five Thousand Dollars (\$75,000) as will be determined by proof introduced into evidence at trial. Plaintiff has incurred costs and is entitled to an award of attorney's fees and costs.

**IX.**

**DEMAND FOR JURY TRIAL**

66. Plaintiff demands a jury trial on all issues.

**X.**

**PRAYER FOR RELIEF**

67. Plaintiff prays for the following relief:

1. For nominal damages of one dollar U.S. (\$1.00);
2. For damages, including actual and punitive damages in excess of \$100,000;
3. For interest at the statutory rate;
4. For an injunction against Defendants; and
4. For such other and further relief as the court deems just and proper.

DATED: 1/23/25

/s/ James R. Stout

JAMES R. STOUT

Nevada State Bar No.: 8680

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*Self Represented*

EXHIBIT 1

#13

vine,GA00 Professional Services > Lawyers

## Stout Law Firm



3.4 (5 Reviews)

Divorce & Family Law, Elder Law

Open • 8:00 am - 6:00 pm

Updated over 3 months ago



Add Review



Call

STOUT LAW FIRM PHOTOS



Reply to troll\_for\_the\_devil's comment



**I am the devil.**

YOU MIGHT ALSO CONSIDER

sponsored

but within seconds of that

last post



Effect · Green Screen

yelp.com

Lauren

Replying to

troll\_for\_the\_devil

#greenscreen #fy #fypage #fory... more



Home



Friends




Inbox



Profile

**EXHIBIT 2**






things to do, nail salons, plumbers

Yelp for Business Write a Review

Las Vegas, NV



« Back to Stout Law Firm

### Why Does Yelp Recommend Reviews?



Hundreds of millions of reviews are posted on Yelp, and our automated recommendation software works in the background to showcase the reviews that it determines are most helpful. These are typically written by active members of the Yelp community who are self-motivated to share their personal, detailed experiences about local businesses. It applies the same objective rules to reviews of every business and treats reviews of advertisers and non-advertisers exactly the same.

The software does something no human can—regularly analyze billions of data points from all reviews, reviewers and businesses to evaluate the usefulness and reliability of each review. It's engineered to provide a level playing field for all businesses on Yelp. Having a great reputation on Yelp shouldn't be about who has the time and resources to ask the most people to write reviews. Great Yelp reviews and ratings should come from consumers who had a great experience that they're inspired to tell others about. Learn more here.

### 16 reviews for Stout Law Firm that are not currently recommended

Note: The reviews below are not factored into the business's overall star rating.



**Nikko B.**  
San Ramon, CA

0 friends

2 reviews


2 photos

1/12/2025

Hey man if you're gonna leave comments and harass women online, atleast have a private account where people can't find where you work, live, and where your kids go to school. I live in Irvine too, don't make me visit.

**Comment from James S. of Stout Law Firm**  
Business Owner

1/13/2025 · The case can be searched through Stout Law Firm, LLP et al v. Taulli et al. The case No.: is...  
Read more



**Robert M.**  
Port Hueneme, CA

0 friends

5 reviews


1 photo

1/12/2025

the douche in charge is a monster and thinks he's the devil. Is this who you want representing you?

**Comment from James S. of Stout Law Firm**  
Business Owner

1/13/2025 · he case can be searched through Stout Law Firm, LLP et al v. Taulli et al. The case No.: is...  
Read more



**Ruby M.**  
Irvine, CA

0 friends

1 review

1/11/2025

I'm a Tiktok creator and for weeks James Stout has been harassing me and commenting nasty things he just commented I am the Devil and his TikTok name is Troll\_for\_the\_devils.. Then I found out with the help on my friends so I decided to leave a comment. I don't think it's ethically appropriate to be posting harassing comments on my TT and being a Lawyer, your supposed to help protect people... I make content about not liking Trump and he's MAGA....

EXHIBIT 3





Comment from James S. of Stout Law Firm  
Business Owner

1/13/2025 · he case can be searched through Stout Law Firm, LLP et al v. Taulli et al. The case No. is...  
Read more



Melinda K.  
Los Angeles, CA  
0 friends  
5 reviews



1/11/2025

This guy calls himself the devil and harasses women online! consider a more reputable lawyer.



Comment from James S. of Stout Law Firm  
Business Owner

1/13/2025 · he case can be searched through Stout Law Firm, LLP et al v. Taulli et al. The case No. is...  
Read more



Cassandra W.  
Upland, CA  
0 friends  
16 reviews  
14 photos



11/12/2024

He's dumb enough to use his full name and occupation when leaving disgusting comments on the internet, so you probably shouldn't trust him to win your case!!



Alyssa M.  
Raleigh, NC  
0 friends  
1 review



11/9/2024

Women stay clear of this man.

James R. Stout Esq. on a public tiktok was found commenting disgusting rhetoric about women being replaceable and there being "less competition for the Thai and Filipinas".

I would strongly reconsider if you want to be represented by someone who seems to have no respect for women and even less respect for asian women.

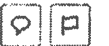


Charlotte T.  
Las Vegas, NV  
9 friends  
2 reviews  
1 photo



11/9/2024

Please be careful hiring this man. He is a misogynist and likes to troll women on social media. This is very unsettling for someone in family law. He is currently being reported to the California bar for his behavior.



Kathryn M.  
San Francisco, CA  
0 friends  
1 review



11/7/2024

Mr. Stout likes to leave exist comments on the social media accounts of women he doesn't know.

